

1 **Andrew A. Bao, Esq.**
2 **Nevada State Bar No. 10508**
3 **ANDREW BAO & ASSOCIATES**
4 **8020 S. Rainbow Blvd., Ste 100-163**
5 **Las Vegas, NV 89139**
6 **Tel: (702) 823-4137**
7 **abao@abao.law**

8 **Attorneys for Plaintiff,**
9 **BIG ROCK ASSETS MANAGEMENT, LLC**

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 **BIG ROCK ASSETS MANAGEMENT LLC, a**
13 **Nevada limited liability company,**

14 **Plaintiff**

15 **v.**

16 **NATIONAL DEFAULT SERVICING**
17 **CORPORATION, BANK OF AMERICA, a**
18 **National Association; DOES I-X; Inclusive**

19 **Defendants**

20 **CASE NO.: 2:22-cv-00909-CDS-DJA**

21 **(Removed from Eighth Judicial District of**
22 **Nevada, Case No. A-22-852207-C)**

23 **STIPULATION AND ORDER TO EXTEND**
24 **TIME TO RESPOND TO BANK OF**
25 **AMERICA, N.A.'S MOTION TO DISMISS**
26 **COMPLAINT (SECOND REQUEST)**

27 **Big Rock Assets Management, LLC ("Plaintiff") and Bank of America, N.A. ("BANA")**
28 **stipulate that Plaintiff shall have up to and including **January 10, 2023**, to file its response to Bank of**
America, N.A.'s Motion to Dismiss Complaint, which is currently due on December 15, 2022.

Good cause exists to grant this extension. Since the first extension was requested, the parties
have discussed parameters that involve dismissing this action with prejudice. One party has agreed to
the parameters and approval is pending with the other party. Thus, a response to the motion to dismiss
may not necessary.

This is the parties' second request for an extension of this deadline and is not intended to cause

any delay or prejudice to any party.

DATED: December 15, 2022.

AKERMAN LLP <i>/s/ Donna Wittig</i> <hr/> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 DONNA WITTIG Nevada Bar No. 11015 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 <i>Attorneys for Bank of America, N.A.</i>	ANDREW BAO & ASSOCIATES <i>/s/ Andrew Bao</i> <hr/> ANDREW A. BAO, ESQ. Nevada Bar No. 10508 8020 S. Rainbow Boulevard, Suite 100-163 Las Vegas, NV 89139 <i>Attorneys for Big Rock Assets Management, LLC</i>
--	--

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE
Case No. 2:22-cv-00909-CDS-DJA

DATED: December 16, 2022